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### REMARKS/ARGUMENTS

The present amendment cancels original claims 1-38. New claims have been added including four independent claims. Claims 1-38 were rejected as obvious in view of Cook and Lewine. Further examination of the application as amended and reconsideration of the rejections are respectfully requested.

The new claims are supported in various aspects of the specification, most especially in the drawings. Support for wireless communication device inventory database comprising MIN or ESN information is found, *inter alia*, at ¶ 22. Support for advanced ordering server module is found, *inter alia*, at ¶ 35. Support for XML-RPC can be found, *inter alia*, at ¶¶ 28, 34, 37, and 39. Support for a downloadable advanced ordering client module can be found, *inter alia*, at ¶¶ 35, 36, 37, and 39. Support for the report generation server module can be found, *inter alia*, at ¶¶ 69-71. Support for html format reports can be found, *inter alia*, at ¶ 69. Support for a report request based on ESN or MIN can be found, *inter alia*, ¶ 68.

#### Rejections under 35 U.S.C. § 103:

Claims 1-38 were rejected under 35 U.S.C. 103(a) as being unpatentable over Cook et al. (U.S. Patent 5,860,068) and Lewine (U.S. Patent 5,784,565). Initially, it is noted there is no motivation to combine the elements from Cook and Lewine because the references are not from analogous arts. Cook discloses a system of building custom CDs from data archives by using workstations in retail

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outlets. Cook's disclosure does not describe giving access to retailers and/or the general public over the internet using standard PCs. Lewine, on the other hand, discloses a system for selling books to the general public over the internet. These types of transactions are drastically different in the way they would be implemented. The types of system that would work well on a company-controlled workstation in a retail outlet would not be analogous to the types of systems one would implement to allow access to retailers and/or the general public on their home computer. Consequently, the arts for Cook and Lewine are not analogous and it is improper to combine the references.

Further, regarding claims 39, 61, 69, and 74, Cook does not teach or suggest a database at column 3, lines 30-46 as the office action suggests. Lewine mentions a database at Col. 3, ll. 38-45 in referring to the World-Wide Web as a database. This is drastically different from the database disclosed in the present invention. Neither Cook nor Lewine disclose or suggest the claimed wireless communication device inventory database operably connected to the server comprising MIN or ESN information stored in the wireless communication device inventory database. The purported combination of Cook and Lewine does not obtain applicant's invention.

Regarding claims 40, 62, 70, and 75, Cook discloses the possibility of using XML as a document format at col. 6, ll. 21-24 but does not disclose XML-RPC.

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Lewine makes no disclosure of XML or XML-RPC. Using XML as a document format is drastically different than the XML-RPC claimed by applicant. Using XML-RPC in conjunction with a wireless communication device inventory database is a novel feature of the current invention. XML-RPC is a protocol used for sending commands not a format for documents. There is no disclosure of using XML-RPC in either Cook or Lewine. Again, the purported combination of Cook/Lewine fails to obtain the claimed invention.

Regarding claims 41-42, neither Cook nor Lewine disclose any form of downloadable module to facilitate communications between the client and server. Cook and Lewine only disclose using preloaded software or standard web browsers.

Regarding claims 43-46, neither Cook nor Lewine disclose or suggest a customer workstation sending an inventory/price request and the server sending an inventory/price response to the customer workstation. Furthermore claims 45 and 46 describe using XML-RPC for the communication pathway which is not disclosed or suggested in either Cook or Lewine.

Regarding claims 47-50, neither Cook nor Lewine disclose or suggest a customer workstation sending an order status request and the server sending an order status response to the customer workstation. Furthermore claims 49 and 50

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describe using XML-RPC for the communication pathway which is not disclosed or suggested in either Cook or Lewine.

Regarding claims 51-54, neither Cook nor Lewine disclose or suggest a customer workstation sending an order submit request and the server sending an order submit response to the customer workstation. Furthermore claims 53 and 54 describe using XML-RPC for the communication pathway which is not disclosed or suggested in either Cook or Lewine.

Regarding claims 55-56, 63-64, 71, and 76, neither Cook nor Lewine disclose reporting in the manner claimed. While the system described in the present invention could include email as a medium for delivering a report, the combination of Cook and Lewine fails to bridge the gap between sending an email as described in Cook and the customer-defined reporting as claimed. The present invention describes reporting feature as "enabling the customer to build a variety of reports based upon specific criteria fed to the RGS by the customer." (§ 68). The Cook/Lewine combination teaching an email confirmation is drastically different than the customizable reports claimed. Claims 56 and 64 further distinguish over Cook's "email" by describing the report as being transmitted via XML-RPC.

Regarding claims 57-58, 65-66, 72, and 77, the reporting feature of the present invention is further distinguished over Cook and Lewine by disclosing that

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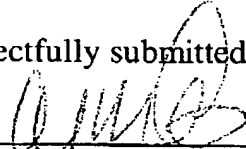
the reports will be transmitted from the server to the customer workstation to be displayed in html format. Claims 58 and 66 further distinguish over Cook by describing the report as being transmitted via XML-RPC.

Regarding claims 59-60, 67-68, 73, and 78, these claims further add novelty to the invention by suggesting that the report request be based on either an ESN or MIN, items unique to the wireless communication industry. Claims 60 and 68 further disclose that the report transport mechanism is XML-RPC.

**CONCLUSION:**

In view of the foregoing, reconsideration of this application and its allowance are respectfully requested. The undersigned is available by telephone if any remaining issues can be resolved in this manner.

Respectfully submitted,



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